

## **Exhibit H**

**Michelle Yvette Amin**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
MICHELLE YVETTE AMIN**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF DELAWARE                     )  
  : SS.:  
COUNTY OF NEW CASTLE                )

MICHELLE YVETTE AMIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2141 Old Kirkwood Road, Bear, Delaware 19701.

2. I am currently 54 years old, having been born on November 20, 1967.

3. I am the sister of Robert Kenner McCain, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from pancreatic cancer on May 30, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Robert and I had a good relationship and were very close. We came from a close-knit family. Robert and I would speak on the phone all the time. We would talk about our children and whatever else was going on in our lives. We lived in different states, but because he often traveled up to New York for work, he would always stop by to see me on the way. We saw each other every other month or so. Robert and I were also taking care of our parents, so we would be in contact about that as well. Our lives were intertwined.

6. Robert went to Ground Zero a day or two after 9/11 to assist with the search and recovery efforts. He was a fireman and was part of the group searching for survivors or bodies in the rubble. I know that this experience and what he saw affected him, especially seeing the emotional and physical state of his fellow firemen. He wanted to go and help people, and that is what he did. He was very proud to be able to help out his “brothers,” as he would call them, and I believe he spent two or three weeks at Ground Zero assisting with these efforts.

7. I remember one time when Robert came to visit me, and he seemed very sick to me. He was reticent and wasn’t able to eat much. This was very unlike him. I told him that he needed to see a doctor, which he did when he returned home. Robert called me after seeing the doctor to tell me that he had a gallbladder infection. He was eventually diagnosed with pancreatic cancer. He had to come to terms with the severity of his diagnosis before telling the rest of the family. I remember him sharing his diagnosis with us at the end of 2016 or the beginning of 2017.

8. Robert began undergoing treatments for his cancer. He had surgery to relieve some pressure on the gallbladder but was told that the pancreatic cancer was inoperable. He also underwent chemotherapy treatments which made him very sick.

9. While Robert was ill, I traveled to see him down in the Atlanta area. And whenever he would visit me, I would help care for him. I still get upset thinking back on that time.

10. Due to Robert’s cancer diagnosis and illness, he couldn’t assist with taking care of our parents. Our mother had Alzheimer’s, and it was difficult to speak with her about Robert’s illness and share any details with her. Robert was very close to our parents, and it was difficult that we were unable to share the news of Robert’s passing with my mother because of her Alzheimer’s. It tore my father up that he couldn’t share their loss and grieve with his wife due to her condition. The situation was torture for the whole family.

11. Robert’s illness was difficult for me. I felt so helpless to assist him in any way that would really make a difference. I only have two siblings, and Robert was the first person I lost that was very close to me. He was a central part of our family and his being gone is very hard to bear.

12. Since Robert’s death, there have been things that I honestly wished he was here



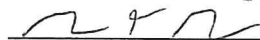
for, like his son's wedding and the burials of both of our parents. Both events were very emotional for different reasons, but Robert not being there was a common thread.

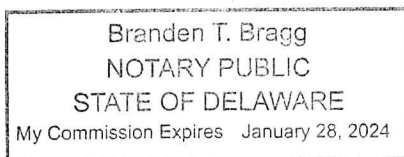
13. Robert was full of life. He loved his family and was a true family man. He was very active in helping other people, whether through his job as a fireman or through his worship. Robert is very much missed, and he should not be gone. He had always been a healthy man, and there is no reason he should be gone now except for his selflessness in helping out other people.

  
MICHELLE YVETTE AMIN

Sworn to before me this  
7 day of ~~June~~, 2022

July BB

  
Notary Public



**Gail Roslyn Davis**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF**  
**GAIL ROSLYN DAVIS**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF DELAWARE            )  
  : SS.:  
COUNTY OF NEW CASTLE        )

GAIL ROSLYN DAVIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 324 Stonehurst Court, New Castle, Delaware 19720.

2. I am currently 67 years old, having been born on January 3, 1955.

3. I am the sister of Robert Kenner McCain, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from pancreatic cancer on May 30, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Robert and I were extremely close. He was two years older than me and would always tease me that I acted like the oldest. Robert was a great talker and always wanted to talk things out with someone. We spoke nearly daily our entire lives and could discuss just about everything. I would describe us as two peas in a pod. Robert would often visit to see our parents or while traveling to New York for fireman business. We also took vacations together, and I remember taking a trip to Jamaica with him. The trip was paid for through my work as a

travel agent, but my husband was unable to make it. So, Robert flew to New York, and we took the trip together.

6. My brother was a fireman and traveled to Ground Zero to help in the aftermath of the 9/11 terrorist attacks. He had retired from a firehouse on Staten Island that had lost many of its personnel during the attacks, so he felt compelled to drive up and help. He spent a few weeks helping with the search and recovery efforts and described his experience as horrific and nightmarish. I remember one story he told me about finding what looked like a gray cloth. It turned out to be a man's suit. When he picked it up, he could tell that the body inside had been crushed by the collapse of the World Trade Center. The whole experience at Ground Zero was emotionally devastating for him, but he felt he needed to help. That was who he was.

7. Robert called me to tell me about his illness and cancer diagnosis. He wanted to see our parents before he began treatment and had to undergo surgery. He did not want them to see him visibly sick. So, my sister and I took my parents on a road trip down to Georgia to see him. I have a picture of the five of us together from this trip.

8. He began undergoing chemotherapy treatments to treat his cancer. Robert had a beautiful head of hair that he was very proud of. It was emotionally difficult for him to lose his hair due to the treatment. Besides his hair loss, his physical appearance changed. He looked noticeably drained. His body physically deteriorated over time from his cancer. It was horrible to witness.

9. When Robert realized that his cancer was terminal, he called to ask me if he did the right thing going to Ground Zero in the aftermath of the attacks. He knew he wouldn't be dying if not for that decision. I told him that he went because he was compelled to and knew many of the firemen who had passed away. He was always trying to help people, and if he had not been retired, we could have lost him many years earlier.

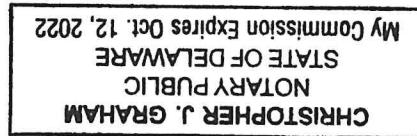
10. I miss Robert dearly. He was bigger than life and a great family man. He raised three boys and was worried about them and the rest of his family until the very end. I understand

that he had to go to Ground Zero, but I honestly wish he had not.

  
GAIL ROSLYN DAVIS

Sworn to before me this  
1st day of ~~June~~, 2022  
July

  
Notary Public



**Dexter McCain**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
DEXTER McCAIN**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF GEORGIA        )  
                                  : SS.:  
COUNTY OF DOUGLAS    )

DEXTER McCAIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3207 Founders Way, Douglasville, Georgia 30135.
2. I am currently 34 years old, having been born on February 29, 1988.
3. I am the son of Robert Kenner McCain, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from pancreatic cancer on May 30, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My father and I were very close. He was family-oriented and focused on being a supportive family man. He would encourage the family to stay in contact with each other. My dad was always there to answer my questions and help me in whatever I needed. Even when I was being a headache and not listening to his advice, he was always there for me. I considered him my best friend and greatest supporter. In retrospect, if I had been smarter, I would have learned so much more from him. I always felt that he was doing his best for his family.



6. My dad and I spent a lot of time together. We loved eating together, throwing a ball around, watching movies, and just sitting and talking. My father was also a very religious person. We spent a lot of time studying the Bible, and he inculcated these values into us.

7. On 9/11, my father saw the attack live on television. He and his friend, Sterling, called each other, made a few arrangements, and drove to New York within a day or two. My father ended up staying on site for about a week to assist in relief efforts. I remember him telling me that they put him in charge of a squad cleaning up the rubble, picking up bodies, looking for survivors. He even told me that one of the bodies they found was squashed – almost like a cartoon character, only it was live flesh. The team had to flatten out the body to find an ID. As far as they could tell, it was a police officer. My father said despite all this, what freaked him out the most was the smell. He described it as a disgusting combination of different smells and of course, the smell of death.

8. Right before the fall of 2016, my father seemed okay to me. He was still his same old self with a few extra gray hairs but nothing to worry about. That is why I was surprised when he told me about being diagnosed with pancreatic cancer. The disease was still in its early stage, and he had a good chance to fight it. At first, he was doing well but for some reason, so it was hard for him to undergo treatment. He took a break at some point and, when he went back for a checkup, the cancer had come back quickly, and my father had to fight a whole lot harder. No matter what, he always kept a smile on his face. He did not like to complain. Even when his feet would hurt him a lot and he would feel that he was walking on needles, he was silent about his suffering.

9. Watching my father go bald was very hard for me. I was always used to a father who took care of himself and his health. With time, I could see clearer and clearer signs of fatigue on him. He started losing his muscle strength. I remember his arms losing tone and weight. This was very hard to watch. He insisted on doing things around the house. Initially, I was sort of in denial. I was sure he was going to beat the cancer but then little by little, I understood what was happening.

10. The last activity I did with my father before his death was put up a television in the living room. He needed a lot of help doing it. I tried to be around him as much as possible, but it was not enough. I feel like I should have spent more time with him growing up. I should

have listened to him more, and I should have tried to learn from him more.

11. Toward the end, when we were in the hospital, I felt the need to tell him I am sorry, and I should have been a better son. He chuckled, held my hand and told me that he has no idea what I was talking about.

12. My father was a good dad who was always there for me. I never thought I would lose him. I never thought I would lose him this way. I still think of him, and I still wish I could have been a better son to him. I wish he could see the person I have become and be proud of me.

13. He touched people in so many ways. He was an example to follow as a family man, as a spiritual man, as a father. He was loved and still is.

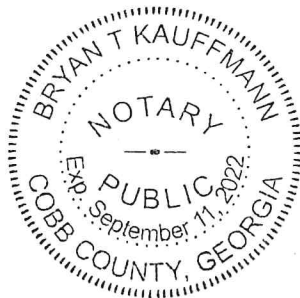
*Dexter McCain*

DEXTER MCCAIN

Sworn to before me this

5 day of ~~June~~ July, 2022

*[Signature]*  
\_\_\_\_\_  
Notary Public



**Dolores McCain**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF  
GAIL ROSLYN DAVIS on behalf  
of DOLORES MCCAIN**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF DELAWARE                    )  
  : SS.:  
COUNTY OF NEW CASTLE            )

GAIL ROSLYN DAVIS on behalf of DOLORES MCCAIN, being duly sworn, deposes  
and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 324  
Stonehurst Court, New Castle, Delaware 19720.

2. I am the sister of Robert Kenner McCain Jr., upon whose death my claim is based.

3. My mother, Dolores McCain, was also a plaintiff in the within action and was  
pursuing her own solatium claim based on the illness and death of her son, Robert Kenner  
McCain, Jr.

4. Dolores passed away on May 7, 2020, after the commencement of the within  
action. I am the proposed personal representative of Dolores's estate.

5. I submit this Affidavit on Dolores's behalf in connection with the pending motion  
for a default judgment and in support of her solatium claim.

6. Dolores's son, Robert Jr., passed away from pancreatic cancer on May 30, 2018.  
It was medically determined that this illness was causally connected to his exposure to the toxins

resulting from the September 11, 2001, terrorist attacks.

7. My mother and Robert Jr. were extremely close. Robert Jr. was her first born and only boy, so she spoiled him rotten. As the oldest child, my brother was very close to both of my parents. Our mom was his confidant. He talked to my mom all the time, every day, sometimes even more than that. He was a talkative person and so was she. They would talk about whatever was on their minds. Our parents lived in Delaware, and Robert Jr. lived in Atlanta. He would fly up to them and visit often. When our parents were healthy, they would travel down to Atlanta to see Robert Jr.

8. My brother Robert was an FDNY fireman and had retired the week before 9/11/2001. He was compelled to respond to the World Trade Center because he wanted to support his firemen brothers. He always called them his “family from the firehouse.” Every day, after he was done responding at Ground Zero, he would call us, including our mother Dolores, to tell everyone how he was doing. He told our family how devastating of an experience it was to be at Ground Zero. He said that it was what he imagined being in a war was like. It was total devastation, and there were dead bodies all throughout the pile. To see it in such great magnitude, he said, was overwhelming. Robert Jr. continued to respond to the World Trade Center for about eight or nine days. We were all nervous, especially our mother Dolores. Our family knew people who worked in the World Trade Center. It was a scary time, especially on the day of, and we were all wondering whether our friends and family in Manhattan were safe.

9. My brother was diagnosed with pancreatic cancer around August 2016. He called my sister and me, because he knew that this diagnosis was serious, and his chances of survival weren’t good. Robert Jr. asked my sister Michelle and me to bring Mom and Dad down to Atlanta for one last family trip before he started chemotherapy. He knew that if Mom saw him after he was bald from the chemotherapy, that she would be upset. So, we drove our parents down from Delaware and had a nice weekend as a family. Our mother went several times after that weekend down to Atlanta to care for Robert Jr. when she could. While Robert Jr. was still strong enough, he would come up to visit us in Delaware when he could. Our mother would dote on him, take him out to ice cream and spend time with him. But as her own health weakened, she wasn’t able to care for him like she used to.

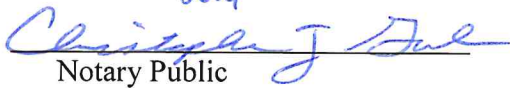


10. Robert Jr.'s illness and passing impacted our mother Dolores in a way that was hard to describe. She suffered from Alzheimer's, and she would constantly ask for Robert Jr. She could only talk to him on the phone, as he was in Atlanta, and she was in Delaware. The day my brother received a terminal prognosis, he called my house. Our mom just so happened to be there. I held the phone for my mother so Robert Jr. could talk to her. Our mom wasn't very lucid because of the Alzheimer's, but when she spoke on the phone with Robert Jr., she had a moment of clarity. When Robert said he loved her, she said, "I love you too son, and I'm very proud of you." Knowing now that that was their last goodbye, I started crying and so did my brother. To know that those were the last words my brother would ever hear from our mother—it was like a blessing. I'm glad that he got to hear her say that.

11. After Robert Jr.'s death, our mother's health started to decline. She would constantly ask for him, and we would have to lie to her because it hurt too much to tell her that he died. We would tell her he was sleeping. Given her memory loss, she was not able to grasp the concept that he died. She was not able to properly mourn him.

  
GAIL ROSLYN DAVIS on behalf of  
DOLORES MCCAIN

Sworn to before me this  
1st day of ~~June~~ <sup>July</sup>, 2022

  
Notary Public

CHRISTOPHER J. GRAHAM  
NOTARY PUBLIC  
STATE OF DELAWARE  
My Commission Expires Oct. 12, 2022

**Pasha McCain**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
PASHA McCain**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF GEORGIA       )  
                                  : SS.:  
COUNTY OF HENRY       )

PASHA McCain, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 553 Trotters Lane, McDonough, Georgia 30252.
2. I am currently 52 years old, having been born on December 30, 1969.
3. I am the wife of Robert Kenner McCain, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Robert passed away from pancreatic cancer on May 30, 2018. It was medically determined that this illness as causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My husband and I were in a good, happy marriage. We raised a beautiful family together. We enjoyed going out to eat and attending jazz concerts in the park. We also enjoyed various outdoor activities and would take regular vacations to tropical islands. Robert loved the beach, specifically Florida, and we spent a lot of time there as well. Finishing the basement was

his passion project that went on for years, and I spent many hours keeping him company and assisting where I could.

6. We were also both active members of our congregation and had recently joined a Portuguese-speaking congregation where we were learning a new language for about two years.

7. Following September 11, 2001, Robert drove to New York within the first 24 hours after the attacks occurred. He was very eager to help out, and he ended up staying for a few days. He later shared a lot of disturbing stories with me: the smells, the sights of destruction. Some of the more disturbing images were seeing bodies and limbs crushed under the weight of the rubble.

8. A few years had passed when we initially felt that something was wrong. Robert lost his appetite, which was weird because we both loved going to restaurants. Suddenly, he stopped eating the things that he usually liked, and he started complaining about pain in his abdomen. We always dismissed it as indigestion.

9. He had gone to the doctor several times for other reasons and no test had shown anything. I was out of town when I was told he was not feeling well and was taken to the hospital. I was very surprised to hear that because I knew that Robert did not like hospitals.

10. I immediately flew back. The ER doctor looked at his CT scan and told us that they noticed a spot in Robert's abdomen area. We automatically knew that this was bad news. Sure enough, the hospital ran more scans and confirmed that it was indeed a tumor.

11. At the beginning of his illness, I was in school. On several occasions, I requested notes from my husband's doctors because I was missing classes, and my school work was being affected. Eventually, it became too difficult to manage. I chose to leave school so that I could become my husband's full-time caregiver and focus on his needs at that time.

12. As his illness advanced, my husband needed assistance to walk and do other things like go to the bathroom, bathe, get in and out of the car. It was physically challenging for me because he was a big guy. I made the decision to send my young son, who was home-schooled, to spend time with my father during the school seasons. The treatments, doctor's visits, and my husband's physical decline began to affect him as well.

13. The whole situation was extremely hard on every member of the family. The doctors were very honest with him from the beginning. What was particularly hard for me was that I knew he wanted to live and was willing to do everything he could to survive. He had endless hope, but when he lost his hair the first time, it hit us both very hard because it was tangible evidence that this illness was also a contender.

14. I would try to be his cheerleader. I always tried to be in a good mood and uplift him. I would often remind him of how handsome he was. It was heartbreaking to look into the eyes of the man I loved so much and know that he was grappling with strong emotions of helplessness, desire to fight, and eventual acceptance. All the while I was also grappling with accepting the situation myself.

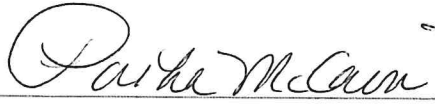
15. I witnessed him fade physically in strength and mentally. He was always a very strong man, who had a lot of knowledge about many things, and a great provider and father who adored our sons. As time went on, he became extremely weak, unable to do most things for himself. His thoughts were not always clear and sometimes he had a hard time explaining things. This was sad, painful and another harsh reality.

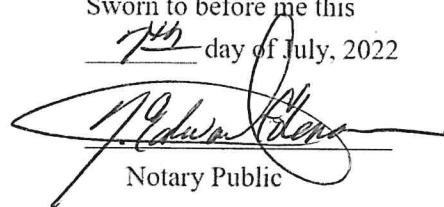
16. When Robert passed away, although he had been ill for a while, he was still my partner, and I still had a hard time coming to terms with it. I missed him dearly, and I still do. Initially, I was focused on my youngest son not being traumatized by seeing my husband pass away. My husband died at home, in his hospital bed, in the living room. His body remained in the home for many hours, and I did not want that image of his father being what my son remembered, so we eventually moved.

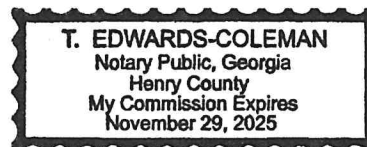
17. I focused my grief on keeping things the same as far as our spiritual and health routines were concerned. I held on to his clothes and belongings; the boys have some of his things. I do things that my husband would do for us to keep the family united. I really did not want anything to change in our family relationship now that their dad was gone.

18. My husband's death has impacted me financially, as he was our sole provider. My son is in his first year of college and began driving this year. Now that I am the sole provider for me and my son, and no longer have my husband to rely on, it is challenging and stressful at times.

19. I am so proud of my boys. Each one reminds me of their father in some way. He was a very unique individual who touched so many people around him, especially his family.

  
PASHA McCAIN

Sworn to before me this  
  
Notary Public



**Remmington Lark McCain**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
REMMINGTON LARK McCain**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY    )  
                                      : SS.:  
COUNTY OF BERGEN     )

REMMINGTON LARK McCain, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 240 Chubb Avenue, Apartment 417, Lyndhurst, New Jersey 07071.

2. I am currently 36 years old, having been born on April 5, 1986.

3. I am the son of Robert Kenner McCain, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on May 30, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Growing up, I was not as close to my father, but I knew he was a respected member of the community. He had a good reputation in our hometown as well as in his job. My parents divorced, and I became closer to my mother at the time.

6. As I grew older, my father and I grew closer, and he played an important role in my life. At some point, we even worked together at the airport in Atlanta, Georgia. Eventually, I moved out of state on April 1<sup>st</sup>, 2017. My father passed away a year and a month later. During that



period, I could not see him as often as I wanted to, but we would consistently talk on the phone, on a weekly basis.

7. On September 11th, 2001, my father saw the attack live on television. Along with a friend, he drove to his old fire department station in New York. They both wanted to help with the relief efforts. My father ended up staying on site for a few days. I remember him telling me about the squashed bodies he and his team had found. On his way back to Georgia, he passed by New Jersey where I lived at the time. He had gotten into a huge argument with one of the neighbors. I remember wondering why he had gotten so aggressive. I still ask myself if it's because of the different fumes he had inhaled at ground zero or if it's because the emotional few days he had had.

8. My father's health began deteriorating in the summer of 2016. He first complained of nausea and pain in his abdomen. I drove him to the hospital, and he had medical tests. I remember he had to sleep there for one night. A few days later, the results had come out, and he was diagnosed with pancreatic cancer.

9. My father's condition caused a lot of tension in the family. Everyone was so worried about him. For me, it was particularly challenging because of all the emotions. My father got old very fast, and his health deteriorated quicker than I could process. I remember he needed massages and physical touch to be able to sleep. We would take turns in massaging his feet until he was able to fall asleep. Toward the end, he was struggling with insomnia from all the pain and medication.

10. A few days before my father passed away, I had to fly out to Atlanta. The whole situation was very challenging. I did not even want to go see my father on his deathbed because I was so emotionally destroyed. When I eventually saw him, I felt that he knew his time had come. We were just sitting with him in his hospital room, walking him to the restroom, assisting him. By that time, he had such a hard time walking. He also had trouble with his eyesight. It was incredibly hard for me to experience this.

11. I was in denial and emotionally numb for a very long time after my father's passing. I still struggle with feelings of anger and blame. From time to time, I replay everything that had happened, and I blame my father and that fateful decision he took. Had he not decided to drive from Atlanta to New York, he would still have been here. I became so much closer with my father later in life, and now he was taken from me. Shortly after my father's passing, I was feeling deeply

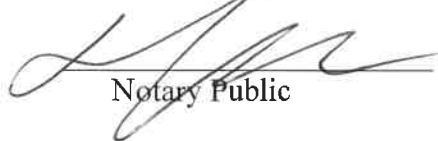


depressed. This considerably affected my health. I currently am on disability leave and cannot work.

12. To this day, I struggle with my grief and feelings of sadness and anger as a result of the attacks of September 11th, 2001, which ultimately took my father from me.

  
REMMINGTON LARK McCain

Sworn to before me this  
28th day of June, 2022

  
Notary Public

**Matthew L De Fede Jr.**  
**NOTARY PUBLIC**  
**State of New Jersey**  
**ID # 50003904**  
**My Commission Expires 10/6/2024**

**Robert Kenner McCain III**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF**  
**ROBERT KENNER McCain III**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF GEORGIA        )  
                                  : SS.:  
COUNTY OF CLAYTON    )

ROBERT KENNER McCain, III, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 200 Forrest Lane, Fayetteville, Georgia 30214.

2. I am currently 38 years old, having been born on February 13, 1984.

3. I am the son of Robert Kenner McCain, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on May 30, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was very close with my father. He lived right around the corner from my job, so I often stopped by to see him. I worked at a barbershop, and so he would sometimes visit me while I was at work. We often spoke on the phone, went to the movies together, and traveled on vacation as a family. We also shared family barbecues and dinners.

6. My father watched the 9/11 terrorist attacks on television with the rest of us. He wanted to help with the search and recovery efforts, so he immediately left for New York with a friend and arrived there the next day. He told me that the devastation he saw working at Ground Zero was horrific. He witnessed a lot of dead bodies. Many of the firemen he knew in New York perished due to the attacks. He lost track of time while working at Ground Zero and spent at least two weeks helping in the aftermath before returning home.

7. I remember my father calling to tell me that he had an issue with his pancreas that was affecting other parts of his body. The cancer diagnosis came in late 2016. I don't believe it had spread at the time, so he began undergoing chemotherapy treatments. He would ultimately go through two rounds. By January 2017, he had lost all of his hair. He was always sick to his stomach and was significantly weakened due to the chemo. My father also needed to undergo surgery related to his cancer.

8. My father had been a generally healthy man before his illness. I was surprised to learn about his cancer diagnosis when he told me.

9. While my father's condition worsened because of his cancer, I would often go to help him with things around the house. There were many things he could no longer do, such as fixing his air conditioners and taking care of the yard. I helped him often, at least every other week. Sometimes, I would go by his house just to check on him. He didn't leave the house often because he was not feeling well, so I would stop by to check on him regularly.

10. My father's death resulted in him missing out on many things. He wasn't present for my younger brother's wedding or my baby brother's graduation. He also missed when I gave my first public talk at our place of worship. We also had an international convention at our place of worship, and he was not there for that either.

11. My life has not been the same without my father. He was a selfless and loving person and a hero to me. He was a huge part of my life, and not having him anymore has created

a massive hole. You can try to fill that hole with other things, but nothing ever does.



ROBERT KENNER McCAIN, III

Sworn to before me this  
12 day of June, 2022



Notary Public



**Robert Kenner McCain Sr.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF GAIL ROSLYN  
DAVIS on behalf of ROBERT  
KENNER MCCAIN SR.**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF DELAWARE                    )  
  : SS.:  
COUNTY OF NEW CASTLE            )

GAIL ROSLYN DAVIS on behalf of ROBERT KENNER MCCAIN SR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 324 Stonehurst Court, New Castle, Delaware 19720.
2. I am the sister of Robert Kenner McCain Jr., upon whose death my claim is based.
3. My father, Robert Kenner McCain Sr., was also a plaintiff in the within action and was pursuing his own solatium claim based on the illness and death of his son, Robert Kenner McCain, Jr.
4. Robert Sr. passed away on May 5, 2020, after the commencement of the within action. I am the proposed administrator of Robert Sr.'s estate.
5. I submit this Affidavit on Robert Sr.'s behalf in connection with the pending motion for a default judgment and in support of his solatium claim.
6. Robert Sr.'s son, Robert Jr., passed away from pancreatic cancer on May 30, 2018. It was medically determined that this illness was causally connected to his exposure from



the toxins resulting from the September 11, 2001, terrorist attacks.

7. Our father and Robert Jr. were very close. They worked together as truck drivers from the time Robert Jr. graduated high school. Our father taught my brother Robert Jr. how to drive. They spent lots of time together, both on the road and off. They loved to go to car and truck shows and fix trucks. They were also both ministers in our congregation. Robert Sr. would stay for weeks at a time with his son Robert Jr. in Atlanta. They were very close. On one of their last trips together, my father and brother got into a truck accident. The truck rolled over, and Robert Jr. was able to save our father before the truck caught on fire. The truck rolled into the woods and our father's ribcage got caught under the steering wheel. They were both helivaced to the Baltimore Critical Care Unit. They both ended up fine, but so many people came to see them from our congregation.


8. My brother Robert was an FDNY fireman and had retired the week before 9/11/2001. He was compelled to respond to the World Trade Center because he wanted to support his firemen brothers. He always called them his "family from the firehouse." Every day, after he was done responding at Ground Zero, he would call us, including our father Robert Sr., to tell everyone how he was doing. He told our family how devastating of an experience it was to be at Ground Zero. He said that it was what he imagined being in a war was like. It was total devastation, and there were dead bodies all throughout the pile. To see it in such great magnitude, he said, was overwhelming. Robert Jr. continued to respond to the World Trade Center for about eight or nine days. We were all nervous. Our family knew people who worked in the World Trade Center. It was a scary time, especially on the day of, and we were all wondering whether our friends and family in Manhattan were safe.

9. My brother was diagnosed with pancreatic cancer around August 2016. He called my sister and me, because he knew that this diagnosis was serious, and his chances of survival weren't good. Robert Jr. asked my sister Michelle and me to bring Mom and Dad down to Atlanta for one last family trip before he started chemotherapy. Our father's favorite thing to do was spend time with his only son and oldest child, Robert Jr. So, we drove our parents down from Delaware and had a nice weekend as a family. Our father went several times after that weekend down to Atlanta to care for Robert Jr. when he could. While Robert Jr. was still strong enough, he would come up to visit us in Delaware. I remember that my father and brother would

spend a lot of time together, just talking, during those visits. They would go to a car show, the movies, or to eat at Old Country Buffet. Even when Robert Jr. had no appetite from the cancer, they would still go out to dinner. They would lay in the bed together when Robert Jr. was too sick to move around. When they were apart, our father would say, "Can you call [Robert Jr.]? I want to make sure he's doing okay." When Robert Jr. called, you could see a light come into my father's eyes.

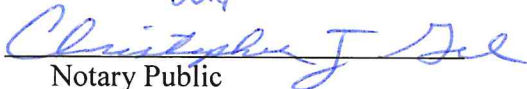
10. Robert Jr.'s illness and passing sent our father into a deep depression. Robert Sr. was not a man of many words, but he was even quieter when Robert Jr. became sick. It was so hard for my father to accept that his son was sick. Our mother had Alzheimer's, so it was hard for our father to grieve with her. He was losing his firstborn son and his wife at the same time. He was losing the two closest people in the world to him. When I asked my father if he wanted to do his favorite things like going out to eat, he would say, "I don't care." Eventually, he was too depressed to even eat. When we knew we didn't have much time left with Robert Jr., it really took a toll on him.

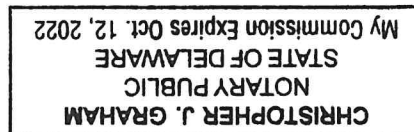
11. No one wants to see their child die before them. Robert Sr. was just not the same after his son's death. My sister Michelle and I cared for our father, so we saw the difference in him. We saw how much he changed. Robert Sr. and Robert Jr. had that male bond. Once Robert Jr. was diagnosed with pancreatic cancer, Robert Sr. understood he had very limited time with his son and that hurt him.

  
GAIL ROSLYN DAVIS on behalf of  
ROBERT KENNER MCCAIN SR.

Sworn to before me this

1st day of ~~June~~<sup>July</sup>, 2022

  
Notary Public



**Debra L. Anagnost**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF  
DEBRA L. ANAGNOST**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF PENNSYLVANIA     )  
  : SS.:  
COUNTY OF NORTHAMPTON    )

DEBRA L. ANAGNOST, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 48 Middle Place, Easton, Pennsylvania 18045.

2. I am currently 54 years old, having been born on November 28, 1967.

3. I am the sister of Paul John Oslovich, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from metastatic prostate cancer on March 9, 2011, at 57 years old. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Despite the 16-year age gap between us, Paul was always a great big brother. He was my go-to for everything. We spent many family holidays together, and Paul would always



spend New Year's at my house. He was always the one to organize family gatherings and events. Paul was the one who taught me how to shoot a gun. We only grew closer with age. He became close with both of my children as well and had plans to teach them as they grew.

6. Paul never told me much about what he went through on 9/11. He was called to the World Trade Center site as a part of the search and rescue. Paul had such a strong instinct and desire to help people any way he could. This drove him not only to go to the WTC on 9/11, but to stay afterwards. He stayed in a clean up capacity for months after the attacks happened.

7. My brother was a very healthy and strong man. His illness came as a shock to me. He was taken to the hospital after being in much pain and suspected something was off. During his visit at the hospital, Paul underwent some testing which revealed he had developed cancer. Paul called me from the hospital to tell me of his cancer.

8. My brother and I being so close meant I really felt the need to be there for him once he got sick. In the beginning, this meant lots of moral and emotional support. We would talk often, and he would confide in me about his progress and things he couldn't share with his family. In a way, his illness brought us even closer together. During the last few weeks of Paul's life, I stepped into a more traditional caretaker role for him. He had been brought home on hospice, and I took a leave of absence from work so I could care for him every day. I provided personal care and helped him with everyday tasks.

9. Paul's illness and death has definitely changed me. My life has grown more painful ever since his passing. I've lost the relationship that I had with my family. He was the glue that held us all together and now that's gone. I hurt for my children as well. He was so excited to see my children grow up and teach them as they grew. He had plans on teaching my son how to shoot a gun like he did with me. It hurts that he won't see my children grow and graduate and do all the things he planned.

10. I think he truly wanted to make a difference in this world. He was the kind of person who would drop everything to help you if he could. The world went through a big loss when he passed away. He had a lot of friends, a lot of people who loved him. It's heartbreaking

to me that I lost such a good person. I will never have my big brother again. It's very hard.

Commonwealth of PA  
County of Northampton

*Debra L. Anagnost*  
DEBRA L. ANAGNOST

Sworn to before me this  
16 day of July, 2022

*[Signature]*  
Notary Public *Jordan Gunn*

Commonwealth of Pennsylvania - Notary Seal  
Jordan Gunn, Notary Public  
Northampton County  
My commission expires May 16, 2023  
Commission number 1351998  
Member, Pennsylvania Association of Notaries



**Nicole M. Heinrich**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF**  
**NICOLE M. HEINRICH**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY    )  
                                      : SS.:  
COUNTY OF OCEAN        )

NICOLE M. HEINRICH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 285 Latimer Avenue, Bayville, New Jersey 08721.

2. My current age is 44 years old, having been born on February 18, 1978.

3. I am the daughter of Paul John Oslovich, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic prostate cancer on March 9, 2011, at 57 years old. It was determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad and I were very close. I was his first-born child and, for nine years, his only child. From as early as I can remember, he was always very involved in my life. There is

not a thing that I can remember that he was not involved in. He loved taking us on night sledding trips when it was snowing. He was an awesome dad.

6. My dad always spared me from specific details about what he saw at the World Trade Center site in order to shelter me. He alluded to things being very graphic and dismal. He spent at least a month in the rubble at ground zero. He was proud to be down there helping all he could. It was intense, around-the-clock work. He was proud to do it and be hands-on as he always was.

7. Being the oldest of my siblings, I was not as sheltered from my dad's illness as the others were. I found out he was not feeling well and had gone to the hospital. He had abdominal pain and thought he had kidney stones or gallstones. A CAT scan revealed he had nodules on his liver. They ran further tests. These tests determined it was small cell carcinoma. He seemed healthy up until he was diagnosed. It was a shock to us.

8. I was present for any and all doctors' appointments after my father's diagnosis. It didn't matter to me whether the appointments were near or far. I wanted to be there for my father. I would go to his chemotherapy treatments with him as well and sit with him the whole time. I would go get his medication when he needed me to. I lived half an hour from my parents at the time but still made sure to be with them every day. Along with help for my father, my parents needed my help with my siblings and household chores.

9. My dad was the rock of the family. He was my go-to for anything and everything. If I was having a rough day, he was there. If I need something fixed, he was there. He was always there to teach me as well. He taught me how to be independent and self-sufficient. He was one of my greatest teachers. He was always very involved with my kids. I think about how different things would be if he was still here. I know he would still be super involved with my life and my kids' lives. He would still be teaching them like he taught me. He was the heart and soul of our family.

10. No matter whose life my dad touched, he left an impact. I still run into people to this day who have a story about how my dad and the difference he made. His legacy is in all the lives he touched.

  
NICOLE M. HEINRICH

Sworn to before me this  
18<sup>th</sup> day of July, 2022

  
Notary Public

